



DELTA STEWARDSHIP COUNCIL

A California State Agency

980 NINTH STREET, SUITE 1500
SACRAMENTO, CALIFORNIA 95814
HTTP://DELTACOUNCIL.CA.GOV
(916) 445-5511

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Ryan Carrothers
California Department of Fish and Wildlife
7329 Silverado Trail
Napa, CA 94558
David.carrothers@wildlife.ca.gov

Chair
Randy Fiorini

Members
Aja Brown
Frank C. Damrell, Jr.
Phil Isenberg
Patrick Johnston
Mary Piepho
Susan Tatayon

Executive Officer
Jessica R. Pearson

RE: Liberty Island Ecological Reserve Land Management Plan SCH# 2015072008

Dear Mr. Carrothers:

Thank you for the opportunity to comment on the Liberty Island Ecological Reserve Land Management Plan (LMP). As you know, the Delta Stewardship Council (Council) is a state agency created by the California Legislature in 2009 to develop and implement a legally enforceable long-term management plan for the Delta. The Delta Plan, adopted on May 16, 2013, applies a common sense approach based on the best available science to achieve the coequal goals of protecting and enhancing the Delta ecosystem and providing for a more reliable water supply for California, while protecting and enhancing the unique cultural, recreational, and agricultural values of the Delta as an evolving place.

The Delta Plan recommended the development of a Delta Science Plan, which the Delta Science Program developed and released in December 2013. The Delta Science Plan outlines a shared vision for the Delta by helping to collaboratively build upon a shared body of scientific knowledge with the capacity to adapt and inform future environmental decisions. We encourage the California Department of Fish and Wildlife (CDFW) to ensure that the LMP for the Liberty Island Ecological Reserve works to help advance the goals and recommendations of the Delta Plan and the Delta Science Plan. Below are Council staff comments regarding elements of the Delta Plan and the Delta Science Plan that could be addressed in the LMP.

Encourage Recreation

The Delta Plan recommends protecting and improving existing recreation opportunities while seeking ways of providing new and better coordinated opportunities. Delta Plan Recommendation **DP R11** calls for providing new and protecting existing recreational opportunities at habitat areas in the Delta whenever feasible, using the California State Parks'

"Coequal goals" means the two goals of providing a more reliable water supply for California and protecting, restoring, and enhancing the Delta ecosystem. The coequal goals shall be achieved in a manner that protects and enhances the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place."

– CA Water Code §85054

Recreation Proposal for the Sacramento-San Joaquin Delta and Suisun Marsh and the Delta Protection Commission's Economical Sustainability Plan as guides. The State Park's Recreation Proposal, completed in 2011, calls for proposed restoration areas to incorporate recreation components, such as boat-in campsites, floating toilets docks, and fishing piers. Moreover, Delta Plan Recommendation **DP R14** calls for CDFW, in cooperation with other agencies, to expand nature-based recreational opportunities, and Delta Plan Recommendation **DP R16** calls for increasing opportunities for recreation on public lands, where feasible. We suggest that CDFW consider installing a boat ramp that will facilitate recreational boating and fishing in the interior of Liberty Island. Although we recognize this portion of Liberty Island contains many boating hazards, it represents one of the few areas of the Delta restored, albeit unintentionally, to shallow-water habitat and as such is a unique place for the public to visit.

Adaptive Management

The first stated purpose of the LMP is to "guide the adaptive management of habitats, species, and programs..." and we appreciate CDFW's commitment to manage Liberty Island through an adaptive process. One of the key goals of the Delta Plan and the Delta Science Plan is to promote the development of adaptive management plans and funding of their implementation. The LMP states that ongoing research and monitoring of the area will be used to guide future management activities in order maintain and enhance the long-term functioning of habitats within the Ecological Reserve. Also, one of the goals for the research and education elements of the LMP is to consider findings of current research when making adaptive management decisions. These goals of the LMP are consistent with the Delta Plan's definition of use of best available science for adaptive management.

However, the LMP does not identify the hypotheses that ongoing monitoring and research will address nor does it describe the decision-making process by which new scientific understanding will be used to alter management of the Liberty Island Ecological Reserve, if necessary. If these processes remain undefined, it is highly uncertain whether effective adaptive management can be carried out. Defining specific objectives and hypotheses for the ecosystem goals in the LMP would help clarify how to direct available funds and staff resources.

The Delta Science Program has adaptive management and science liaisons who work with restoration proponents and land managers to develop adaptive management plans that are informed by the best available science. Science Program staff are willing to actively work with CDFW staff to more fully develop an adaptive management strategy for the Liberty Island Ecological Reserve that will use current monitoring data and scientific research to guide CDFW's management of the property.

Performances Measures

The Delta Plan has performance measures which capture important trends and provide insights into whether specific actions are producing expected results. Using these performance measures, Council staff reports regularly to the Council on progress towards implementing

Delta Plan policies and recommendations. Monitoring and research on Liberty Island could provide data needed for ecosystem-related performance measures.

One of the Delta Plan performance measures is “Progress toward the documented occurrence and use of protected and restored habitats and migratory corridors by native resident and migratory Delta species.” Another measure is “Progress toward decreasing annual trends in both the number of new and existing aquatic and terrestrial nonnative species, and the abundance and distribution of existing aquatic and terrestrial nonnative species in the Delta over the next decade.” The LMP calls for, if funding allows, annual monitoring of riparian and grassland birds and other wildlife species, as well as research and monitoring of special-status fish, birds, and other wildlife. Additionally, the LMP seeks to conduct annual monitoring of invasive plant species. We would appreciate coordination with CDFW staff to see if future monitoring of native plant and wildlife as well as nonnative invasive species in the Liberty Island Ecological Reserve can inform the Delta Plan performance measures.

Final Remarks

Overall, we believe that the current draft of the LMP provides a solid foundation for guiding future management of the Liberty Island Ecological Reserve. We believe there are opportunities for Council staff to support CDFW in finalizing the management strategy for this Ecological Reserve as well as opportunities for CDFW to help support the goals of the Delta Plan and Delta Science Plan. If you need any clarification regarding our comments, I encourage you to contact Darcy Austin at Darcy.Austin@deltacouncil.ca.gov or (916) 445-0147 or Jessica Davenport at Jessica.Davenport@deltacouncil.ca.gov or (916) 445-2168.

Sincerely,

A handwritten signature in blue ink that reads "Cindy Messer". The signature is fluid and cursive, with the first name "Cindy" being more prominent than the last name "Messer".

Cindy Messer
Deputy Executive Officer
Delta Stewardship Council